

EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DEBORAH E. BERK

I, Deborah E. Berk, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks occurred. I was in the WTC North Tower coming up from the Port Authority Transit Hub on my morning commute.

4. I was employed with Rittenhouse Securities, Inc. at the New York Stock Exchange on Wall Street NYC.

5. I was in New York City at the Port Authority Transit Hub in the North Tower at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and

collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injury(ies) on September 11, 2001: a closed head injury with resultant brain injury when I was struck in the back of the head as I was lying on the ground; I also had a broken foot, knee injuries and was diagnosed and have been treated for PTSD. I had a knee arthroscopic procedure in January of 2002. To this day I continue to experience pain and have difficulty walking due to my foot and knee injuries. I was treated with in-patient psychiatric care on multiple occasions due to the horrible events of that day. I continue to receive treatment for my PTSD to include both Psychological counseling with Triad Psychiatry in Greensboro, NC, and prescription drugs to include Wellbutrin, Sertraline, quetiatine zolpidem and lorazepam.

7. When the attacks occurred, I heard the crash and felt the tremors. I was immersed in a flood of victims trying to escape. I saw many injured and die that day. The poor souls who were forced to jump from the Towers landed right next to me. Two men in Business suits dragged me across the street to the park. I was witness to all the events of the day as I dragged my body 5 blocks up the West Side Highway when the Towers collapsed. At that time, I was inundated with ash and smoke and to this day, I have bronchitis and COPD although I have never smoked cigarettes. Since that day, I have been unable to work due to my PTSD. I have difficulty sleeping and experience frequent anxiety.

8. I sought medical attention for my injuries. I continue to receive treatment for my PTSD to include both Psychological counseling and prescription drugs. Attached as Exhibit (B)

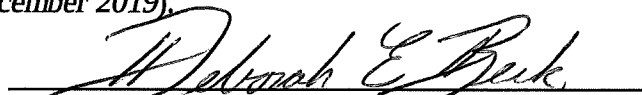
to this Declaration is a true and correct copy of medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim (claim number unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 30th day of (*December 2019*).


Signature of Declarant – Deborah E. Berk

Exhibits Filed Under Seal